

FILED

APR 24 2008 VSJ

**US BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

TAWANA C. MARSHALL, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

IN RE: § **CASE NO. 07-70500-HDH-13**
§
Roxana Aracely Segura § **CHAPTER 13**
§
DEBTOR §

**MOTION TO APPROVE EMPLOYMENT OF ATTORNEY
FOR SPECIAL PURPOSES**

COMES NOW Debtor, Roxana Aracely Segura, in the above-titled Chapter 13 case and requests approval of this Court to employ Carolyn Ostovich, attorney with the firm Mason, Snodgrass, and Ostovich, for the purpose of representation in a personal injury lawsuit arising out of a motor vehicle collision which occurred May 17, 2006. In support thereof she respectfully shows the court as follows:

1. Plaintiff was injured in a motor vehicle collision May 17, 2006.
2. Attorney desires to be employed and appointed for special purpose to represent regarding the aforesaid specific claim. Attorney agrees for the performance of said legal services described herein involving the specific claim and for said attorney to receive compensation of an undivided contingency interest into the claim upon the following terms and conditions:

Contingency Based Fees: The attorney's fees for said special counsel are 33 1/3 % if the client settles before filing lawsuit or 40% of gross amounts if after a lawsuit is filed.

Reimbursement of Expenses: Attorney is also entitled to reimbursement of reasonable and necessary expenses in pursuing said claim/lawsuit contingent upon a recovery.

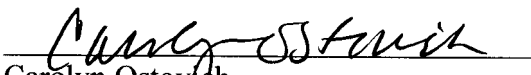
3. Said attorney is fully competent to advise the Trustee on all matters which are now anticipated to arise in this proceeding and protect or preserve all rights of Trustee.
4. Said attorney represents no adverse interest to the Trustee or the estate with respect to

matters upon which Attorney is to be engaged, and the employment of said Attorney would be in the best interest of this estate. To the best of Attorney's knowledge, said Attorney has no connection with the creditors herein or any other party in interest or the respective Attorney's which would interfere with or hinder the faithful performances of her duties herein. An Affidavit supporting this statement is attached hereto as Exhibit "A". A proposed Order Approving Employment of Attorney for Special Purposes is attached as Exhibit "B".

WHEREFORE, PREMISES CONSIDERED, the undersigned attorney prays for an order from the Court for authority to be employed and appointed for a special purpose to represent the Trustee in this proceeding regarding the aforesaid Claim, and Attorney prays for general relief.

Respectfully submitted on this the 22 day of April, 2008.

MASON, SNODGRASS & OSTOVICH


Carolyn Ostovich
Texas SBN: 04662020
P.O. Box 3809
Wichita Falls, Texas 76301-0809
Tel: (940)-761-2000
Fax: (940)-322-8580
Email: c.ostovich@msolawfirm.com

CERTIFICATE OF SERVICE

I, Carolyn Ostovich, hereby certify that I have on this date placed in the United States Mail, postage prepaid, a true and correct copy of the above and foregoing Motion to Approve Employment of Attorney for Special Purposes to the following:

Walter OCheskey Trustee
6308 Iola Avenue
Lubbock, TX 79424

Monte J. White
Monte J. White & Associates, P.C.
1106 Brook Avenue
Wichita Falls, Texas 76301

This 22 day of April 2008.


Carolyn Ostovich

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS

In Re: ROXANA ARACELY SEGURA

CASE NO. 07-70500-HDH-13

DEBTOR

EXHIBIT A

STATE OF TEXAS
COUNTY OF WICHITA

AFFIDAVIT

The undersigned, Carolyn Ostovich, Attorney at Law, of Mason, Snodgrass & Ostovich, P.C. and of lawful age, after first being duly sworn, and on her oath, states as follows:

(1). I am Carolyn Ostovich, Attorney at Law, at Mason, Snodgrass & Ostovich, P.C and duly licensed to practice law in the State of Texas and am a member in good standing of the Bar of the State of Texas.

(2). That Mason, Snodgrass & Ostovich is willing to be special counsel to make demand, pursue a claim or recovery, and/or file a lawsuit for the recovery of money or property involving specifically a motor vehicle collision May 17, 2006.

(3). Mason, Snodgrass & Ostovich is willing to be employed as special counsel for the performances of said legal services described herein with said attorney receiving compensation of an undivided contingent interest in said Claim upon the following terms and conditions:

Contingency Based Fees: The attorney's fees are proposed on a contingency fee basis set forth as 33 1/3% of any gross amounts settled prior to lawsuit and 40% of gross amounts of any settlement or judgment after a lawsuit is filed.

Reimbursement of Expenses: Contingent upon a recovery, said Attorney is also entitled to reimbursement of reasonable and necessary expenses in pursuing said claims.

(4). To the best of my knowledge, Mason, Snodgrass & Ostovich, P.C. does not represent any interest adverse to the Bankruptcy Estate.

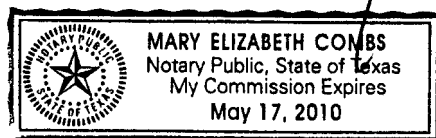
This the 22 day of April, 2008.

Carolyn Ostovich
Mason, Snodgrass & Ostovich, P.C.
By Carolyn Ostovich
Attorney at Law
P.O. Box 3809
Wichita Falls, Texas 76301-0809
Tel: (940)-761-2000
Fax: (940)-322-8580
Email: c.ostovich@msolawfirm.com

SWORN TO AND SUBSCRIBED before me on this the 22nd day of April, 2008.

Mary Elizabeth Combs
NOTARY PUBLIC

(SEAL)



My Commission Expires: May 17, 2010

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:	§	CASE NO. 07-70500-HDH-13
	§	
Roxana Aracely Segura	§	CHAPTER 13
	§	
	§	
DEBTOR	§	

ORDER APPROVING EMPLOYMENT OF ATTORNEY
FOR SPECIAL PURPOSES

Upon the Motion of the Debtor, Roxana Aracely Segura, in the above case, to employ Carolyn Ostovich, Attorney at Law, for the purpose of representation in a personal injury claim/lawsuit arising out of a motor vehicle collision on May 17, 2006.

IT IS ORDERED that the employment of Carolyn Ostovich, as shown above, is approved.

###END OF ORDER###

PREPARED BY:

Mason, Snodgrass & Ostovich

Carolyn Ostovich

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